

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA
ex rel. AIDAN FORSYTH,

Plaintiff,

V.

THE HERB CHAMBERS COMPANIES, et al.,

Defendants.

No. 24-CV-11177-PBS

**UNITED STATES' NOTICE OF INTERVENTION
FOR PURPOSES OF SETTLEMENT**

Pursuant to 31 U.S.C. § 3730(b)(2) and (4), the United States notifies the Court of its decision to intervene in this action solely for the purposes of settlement with the defendants.

The parties in this action, including the United States, the relator, and HCC, have executed a settlement agreement effective April 9, 2025 (the “Settlement Agreement”), which resolves this False Claims Act action. The United States and the relator will promptly file a Joint Notice of Stipulation of Dismissal after HCC has made payment pursuant to the terms of the Settlement Agreement.

In accordance with the Court's Order on April 1, 2025, upon the filing of this Notice of Intervention, the case is unsealed, and the government requests that the relator's Complaint, this Notice of Intervention, and all future filings be made available on the public docket.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

Dated: April 9, 2025

By: /s/ Charles B. Weinograd
Charles B. Weinograd
Alexandra Brazier
Assistant United States Attorneys
United States Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100
Charles.Weinograd@usdoj.gov
Alexandra.Brazier@usdoj.gov

CERTIFICATE OF SERVICE

I, Charles B. Weinograd, Assistant United States Attorney, hereby certify that I caused a copy of the foregoing document to be served by e-mail on the following counsel:

Christine M. Kingston
Nystrom Beckman Paris LLP
One Marina Park Drive, 15th Floor
Boston, MA 02210
(617) 778-9100
ckingston@nbparis.com

Eric H. Jaso
363 Bloomfield Avenue, Second Floor
Montclair, NJ 07074
(973) 232-0881
ejaso@spiroharrison.com

Dated: April 9, 2025

By: /s/ Charles B. Weinograd
Charles B. Weinograd
Assistant United States Attorney